IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

TYCHE LICENSING LLC,	§	Case No.
Plaintiff,	§	**JURY TRIAL DEMANDED**
v.	§	
STMICROELECTRONICS N.V. and STMICROELECTRONICS INTERNATIONAL N.V.,	§	
Defendants.	§	

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Tyche Licensing LLC ("Tyche" or "Plaintiff") for its Complaint against Defendants STMicroelectronics N.V. and STMicroelectronics International N.V. (collectively, "STMicro" or "Defendants") alleges as follows:

THE PARTIES

1. Tyche is a limited liability company organized and existing under the laws of the State of Texas, with its principal place of business located at 100 West Houston Street, Marshall, Texas 75670.

2. Defendant STMicroelectronics N.V. ("ST-NV") is a Dutch semiconductor company which owns approximately sixty subsidiaries[1] and is one of the largest semiconductor companies in the world.

[1] *See* ST-NV United States Securities and Exchange Commission Form 20-F (filed February 24, 2022) at 31-32, available at, https://www.sec.gov/ix?doc=/Archives/edgar/data/0000932787/000156459022006712/stm-20f_20211231.htm.

3. ST-NV is organized under the laws of The Netherlands, with its corporate legal seat in Amsterdam, The Netherlands, and head offices at WTC Schiphol Airport, Schiphol Boulevard 265, 1118 BH Schiphol, The Netherlands.[2]

4. ST-NV's "headquarters and operational offices are managed through [its] wholly-owned subsidiary, STMicroelectronics International N.V., and is located at 39 Chemin du Champ des Filles, 1228 Plan-Les-Ouates, Geneva, Switzerland."[3]

5. ST-NV is "organized in a matrix structure with geographic regions interacting with product lines, both supported by shared technology and manufacturing operations and by central functions, designed to enable [it] to be closer to our customers and to facilitate communication among the R&D, production, marketing and sales organizations."[4]

6. ST-NV is the "parent company," but it conducts its "global business through STMicroelectronics International N.V." and also conducts its "operations through service activities from [its] [wholly-owned] subsidiaries."

7. ST-NV "provide[s] certain administrative, human resources, legal, treasury, strategy, manufacturing, marketing and other overhead services to [its] consolidated subsidiaries."[5]

8. ST-NV "design[s], develop[s], manufacture[s] and market[s] thousands of products which [it] sell[s] to over 200,000 customers."[6]

---

[2] ST-NV United States Securities and Exchange Commission Form 20-F (filed February 24, 2022) at 20, available at, https://www.sec.gov/ix?doc=/Archives/edgar/data/0000932787/000156459022006712/stm-20f_20211231.htm

[3] *Id*.

[4] *Id*. at 31.

[5] *Id*.

[6] *Id*. at 26.

9. ST-NV engages distributors and sales representatives to promote and distribute its products around the world, including in Texas. ST-NV states, "[o]ur distributors have a dual role, in that they assist in fulfilling the demand of our customers by servicing their orders, while also supporting the creation of product demand and business development. Most of our sales to distributors are made under specific agreements allowing for price protection and stock rotation for unsold merchandise."[7]

10. ST-NV sells and offers for sale devices containing integrated circuits with symmetric inductors, including the Accused Products, to distributors in the United States, including in this District, including Avnet (3101 East President George Bush Highway, Richardson, Texas 75082), Future Electronics (2301 West Plano Parkway, Suite 215, Plano, Texas 75075), and Arrow (6340 International Parkway, Suite 100, Plano, Texas 75093).[8]

11. In addition, ST-NV claims to "also sell and deliver [its] products to electronics manufacturing services ("EMS") companies, which, on a contractual basis with [its] customers, incorporate [its] products into the application specific products they manufacture for [its] customers. [It] also sell[s] products to original design manufacturers ("ODM"). ODMs manufacture products for [its] customers much like EMS companies do, but they also design applications for [its] customers, and in doing so themselves select the products and suppliers that they wish to purchase from. In furtherance of [its] strong commitment to quality, [its] sales organizations include personnel dedicated to close monitoring and resolution of quality related issues."[9]

[7] *Id*. at 27.
[8] ST Contacts Distributors, available at, https://www.st.com/content/st_com/en/contact-us.html
[9] *Id*.

12. ST-NV "combine[s] both front-end and back-end manufacturing and technology R&D under the same organization," and in 2021 its R&D expenses totaled more than $1.7bn.[10]

13. ST-NV derives a significant portion of its revenues from sales to Original Equipment Manufacturers, described as, "[o]riginal Equipment Manufacturers ("OEM") are the end-customers to which the Company provides direct marketing application engineering support, while Distribution refers to the distributors and representatives that the Company engages to distribute its products around the world."[11] ST-NV's largest customer is Apple.[12] ST-NV semiconductor chips, including the Accused Products,[13] including the ST33G1, are present in Apple products sold in the United States, as well as in Texas, such as the iPhone 11Pro Max.[14] Locations in this District such as Best Buy[15] and Walmart Supercenter[16] sell Apple iPhone 11 products. Walmart and Best Buy are Apple Authorized Resellers, and Best Buy is an Apple Authorized Service Provider for repairs.

14. ST-NV product datasheets, including for the Accused Products, state, "STMicroelectronics NV and its subsidiaries ("ST") reserve the right to make changes, corrections, enhancements, modifications, and improvements to ST products and/or to this document at any time without notice."[17]

---

[10] *Id*. at 27-28.
[11] *Id*. at F-45.
[12] *Id*.
[13] *See* ¶ 43.
[14] TechInsights Apple iPhone 11 Pro Max Teardown, available at, https://www.techinsights.com/blog/apple-iphone-11-pro-max-teardown.
[15] 422 West Loop 281, Ste. 100, Longview, Texas 75605.
[16] #398, 515 East Loop 281, Longview, Texas 75605.
[17] ST33G1M2, ST33G1M0, ST33G896, ST33G768, ST33G640, ST33G512 Datasheet at 7, available for download at https://www.st.com/en/secure-mcus/st33g1m2.html.

15. ST-NV alone and/or through STMicroelectronics International N.V. ("ST-INT") makes, uses, sells, offers for sale, and imports devices containing integrated circuits with symmetric inductors, including the Accused Products. By design and on purpose, ST-NV and/or ST-INT place devices containing integrated circuits with symmetric inductors, including the Accused Products, including the ST33G1, into the stream of commerce throughout the United States, including this District, via an established distribution channel.

16. ST-NV alone and/or through ST-INT supplies devices containing integrated circuits with symmetric inductors including the Accused Products, including the ST33G1, used in STMicro customers' application specific products that are imported into the United States.

17. Defendant ST-INT is a wholly-owned subsidiary of ST-NV and is a company incorporated under the laws of the Netherlands, having its registered offices at WTC Schiphol Airport, Schiphol Bboulevard 265, 1118 BH Luchthaven Schiphol, Amsterdam, The Netherlands, acting through its Swiss branch at 39, Chemin du Champ-des-Filles, CH-1228 Geneva–Plan-Les-Ouates, Switzerland.[18]

18. Under ST-NV's supervision, direction and control, ST-INT makes, uses, sells, offers for sale, and imports devices containing integrated circuits with symmetric inductors, including the Accused Products, including the ST33G1. By design and with purpose, ST-INT places devices containing integrated circuits with symmetric inductors, including the Accused Products, including the ST33G1, into the stream of commerce throughout the United States, and in this District, via an established distribution channel.

[18] ST-NV United States Securities and Exchange Commission Form 20-F (filed February 24, 2022) at 20, available at, https://www.sec.gov/ix?doc=/Archives/edgar/data/0000932787/000156459022006712/stm-20f_20211231.htm.

19. Upon information and belief, ST-INT sells and offers for sale devices containing integrated circuits with symmetric inductors, including the Accused Products, to customers in the United States.

20. Upon information and belief, ST-INT sells and offers for sale devices containing integrated circuits with symmetric inductors, including the Accused Products, to customers outside the United States.

21. Upon information and belief, ST-INT sells and offers for sale devices containing integrated circuits with symmetric inductors, including the Accused Products, to customers in Texas.

22. Upon information and belief, ST-INT sells and offers for sale devices containing integrated circuits with symmetric inductors, including the Accused Products, to distributors in the United States, including in this District, including Avnet (3101 East President George Bush Highway, Richardson, Texas 75082), Future Electronics (2301 West Plano Parkway, Suite 215, Plano, Texas 75075), and Arrow (6340 International Parkway, Suite 100, Plano, Texas 75093).[19]

23. Upon information and belief, ST-INT sells and offers for sale devices containing integrated circuits with symmetric inductors, including the Accused Products, to customers in the United States and negotiates such offers in the United States, but consummates the sale and delivery of the products elsewhere.

24. Upon information and belief, ST-INT sells and offers for sale devices containing integrated circuits with symmetric inductors, including the Accused Products, entirely abroad to intermediaries who then import the products into the United States.

[19] ST Contacts Distributors, available at, https://www.st.com/content/st_com/en/contact-us.html.

25. Upon information and belief, ST-INT sells and offers for sale devices containing integrated circuits with symmetric inductors, including the Accused Products, entirely abroad to customers with knowledge that the products will be imported into the United States.

26. Upon information and belief, ST-INT sells and offers for sale devices containing integrated circuits with symmetric inductors, including the Accused Products, entirely abroad to EMS companies with knowledge that the products will be imported into the United States.

27. Upon information and belief, ST-INT sells and offers for sale devices containing integrated circuits with symmetric inductors, including the Accused Products, entirely abroad to ODMs and OEMs with knowledge that the products will be imported into the United States.

JURISDICTION

28. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq*. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

29. ST-NV, directly and/or through subsidiaries and agents (including distributors, retailers, and others) makes, imports, ships, distributes, offers for sale, sells, uses, and advertises (including offering products and services through its website, https://www.st.com) its products and/or services in the United States, the State of Texas, and the Eastern District of Texas.

30. ST-INT, directly and/or through subsidiaries and agents (including distributors, retailers, and others) makes, imports, ships, distributes, offers for sale, sells, uses, and advertises (including offering products and services through its website, https://www.st.com) its products and/or services in the United States, the State of Texas, and the Eastern District of Texas.

31. ST-NV and ST-INT acting separately and/or together and/or at the direction and subject to the control of the other, directly and/or through its subsidiaries and agents (including

distributors, retailers, and others), have purposefully and voluntarily placed one or more of the Accused Products into the stream of commerce throughout the United States with the expectation that the products will be purchased and used by customers in this District. These infringing products have been and continue to be purchased and used by customers in this District. For example, the ST33G1, which operates in the Apple iPhone 11 Pro Max. Apple iPhone products are available for purchase in this District at Walmart Supercenter and Best Buy. Additionally, ST-NV's other major customers such as Bosch, HP, Samsung, and Tesla[20] all have products that are sold in this District. Further, ST-NV and/or ST-INT have targeted this District with local distributors of the Accused Products.[21] ST-NV and ST-INT have committed acts of patent infringement within Texas and, more particularly, within this District.

32. ST-NV and ST-INT are also subject to this Court's specific personal jurisdiction, because the present dispute arises from, and is related to, each of ST-NV's and ST-INT's activities in Texas and in this District, as described above. These activities include ST-NV alone and/or through ST-INT soliciting business from, and transacting business with others in the State of Texas in this District, including sales of the company's devices containing integrated circuits with symmetric inductors in application specific products discussed above.

33. ST-NV, directly and/or through subsidiaries and agents (including distributors, retailers, and others), makes, imports, ships, distributes, offers for sale, sells, uses, and advertises (including offering products and services through its website, https://www.st.com) its products

[20] ST-NV United States Securities and Exchange Commission Form 20-F (filed February 24, 2022) at 26, available at, https://www.sec.gov/ix?doc=/Archives/edgar/data/0000932787/000156459022006712/stm-20f_20211231.htm.

[21] Avnet (3101 East President George Bush Highway, Richardson, Texas 75082), Future Electronics (2301 West Plano Parkway, Suite 215, Plano, Texas 75075), and Arrow (6340 International Parkway, Suite 100, Plano, Texas 75093).

and/or services in the United States, the State of Texas, and this District. ST-NV has over 80 sales and marketing offices in 35 countries, with 14 in the United States, including in Texas.[22]

34. This Court's exercise of personal jurisdiction over each of ST-NV and ST-INT is therefore consistent with the Texas Long Arm statute and traditional notions of fair play and substantial justice.

35. This Court has personal jurisdiction over each of ST-NV and ST-INT, under Federal Rule of Civil Procedure 4(k)(2), because (i) Tyche sues ST-NV and ST-INT for patent infringement pursuant to 35 U.S.C. § 271, (ii) ST-NV and ST-INT are foreign entities not subject to jurisdiction in any particular state's courts of general jurisdiction, and (iii) the exercise of personal jurisdiction over each of ST-NV and ST-INT satisfies due process.

36. Venue is proper in this Judicial District pursuant to 28 U.S.C. § 1391 because, among other things, Defendants are not residents in the United States, and thus may be sued in any judicial district pursuant to 28 U.S.C. § 1391(c)(3).

PATENTS-IN-SUIT

37. On May 31, 2005, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 6,900,087 (the "'087 Patent") entitled "Symmetric Inducting Device for an Integrated Circuit Having a Ground Shield." A true and correct copy of the '087 Patent is available at https://pdfpiw.uspto.gov/.piw?PageNum=0&docid=06900087.

38. On August 1, 2006, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 7,084,481 (the "'481 Patent") entitled "Symmetric Inducting Device for an

[22] *See* Company Presentation at 2 (May 2022), available at https://www.st.com/content/ccc/resource/corporate/company/company_presentation/8d/fc/ba/0b/41/0d/47/12/company_presentation.pdf/files/company_presentation.pdf/jcr:content/translations/en.company_presentation.pdf

Integrated Circuit Having a Ground Shield." A true and correct copy of the '481 Patent is available at https://pdfpiw.uspto.gov/.piw?PageNum=0&docid=7084481.

39. Tyche is the sole and exclusive owner of all right, title, and interest in the'087 Patent and the '481 Patent (collectively, the "Patents-in-Suit"), and holds the exclusive right to take all actions necessary to enforce its rights to the Patents-in-Suit, including the filing of this patent infringement lawsuit. Tyche also has the right to recover all damages for past, present, and future infringement of the Patents-in-Suit and to seek injunctive relief as appropriate under the law.

40. Tyche has at all times complied with the marking provisions of 35 U.S.C. § 287 with respect to the Patents-in-Suit.

FACTUAL ALLEGATIONS

41. The Patents-in-Suit generally cover systems and methods related to inducting devices in integrated circuits.

42. The technology described in the '087 Patent was developed by Rex Everett Lowther and William R. Young of Globespan Virata Inc. By way of example, this technology is implemented today in integrated circuits used in wireless communication devices.

43. The technology described in the '481 Patent was developed by Rex Everett Lowther and William R. Young of Conexant Systems, Inc. By way of example, this technology is implemented today in integrated circuits used in wireless communication devices.

44. STMicro has infringed and is continuing to infringe one or more of the Patents-in-Suit by making, using, selling, offering to sell, and/or importing, and by actively inducing others to make, use, sell, offer to sell, and/or import devices containing integrated circuits with symmetric inductors (the "Accused Products"). Such products include, but are not limited to, BlueNRG-1,

BlueNRG-2, ST33G1M2, ST33G1M2A, ST33G1M2M, ST33J2M0, ST60A2G0, ST60A3G1, STA8089FG, STA8089FGA, STA8089G, STA8089GA, STA8089GAT, STA8090EXGA, STA8090FG, STA8090GA, STA8090WG, STGAP2SICSNTR, STM32WB15, STM32WB30CE, STM32WB35CC, STM32WB35CE, STM32WB50CG, STM32WB55CC, STM32WB55CE, STM32WB55CG, STM32WB55RC, STM32WB55RE, STM32WB55RG, STM32WB55VC, STM32WB55VE, STM32WB55VG, STM32WB55VY, STM32WB55MMG, STM32WLE4C8, STM32WLE4CB, STM32WLE4J8, STM32WLE4JB, STM32WLE4CC, STM32WLE4JC, STM32WLE5C8, STM32WLE5CB, STM32WLE5CC, STM32WLE5J8, STM32WLE5JB, STM32WLE5JC, STM32WL54JC, STM32WL54CC, STM32WL55CC, STM32WL55JC, S2-LP, SPIRIT1, SPSGRFC, Teseo-LIV3F, and any variants and other STMicro processors within the same product families as those named herein.

COUNT I
(Infringement of the ’087 Patent)

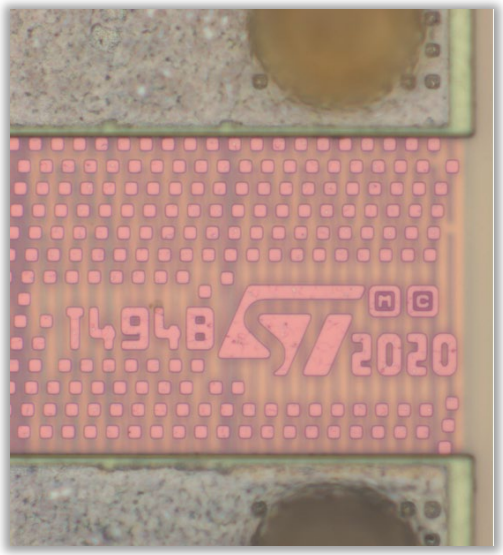
45. Paragraphs 1 through 44 are incorporated by reference as if fully set forth herein.

46. Tyche has not licensed or otherwise authorized Defendants to make, use, offer for sale, sell, or import any products that embody the inventions of the ’087 Patent.

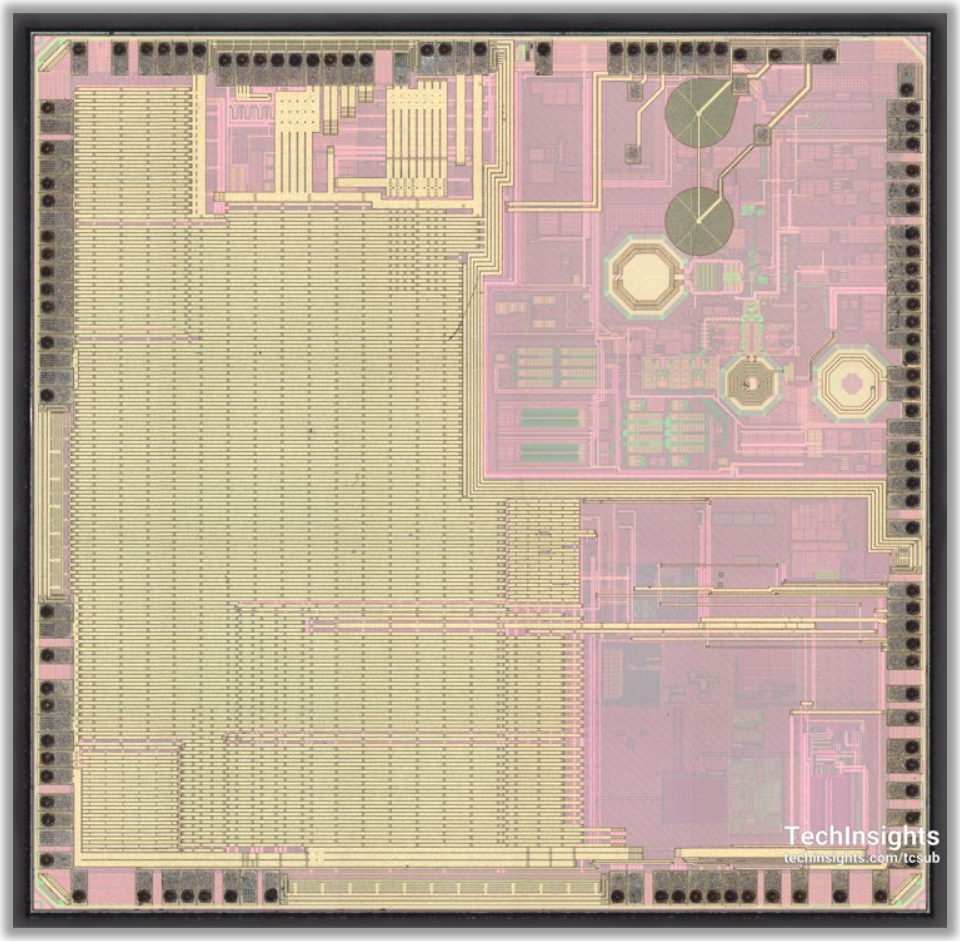
47. Defendants have and continue to directly infringe the ’087 Patent, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, selling, and/or importing into the United States the Accused Products made using the patented methods including, but not limited to, products that satisfy each and every limitation of one or more claims of the ’087 Patent. Upon information and belief, such products include at least STMicro processors containing a symmetric inductor with current routers in an integrated circuit.

48. For example, Defendants have and continue to directly infringe at least claim 17 of the ’087 Patent by making, using, offering to sell, selling, and/or importing into the United States products that include a symmetric inducting device for an integrated circuit. For example, the Accused Products, including the STM32WB15 processor, include a symmetric inducting device for an integrated circuit. The symmetric inducting device is produced by performing a method of forming a symmetric inducting device for an integrated circuit. The method includes patterning one or more pairs of current path regions in a main metal layer that overlays a working surface of a substrate of an integrated circuit, wherein each pair of current path regions are patterned to be generally symmetric about a plane of symmetry that is perpendicular to the working surface of the substrate.

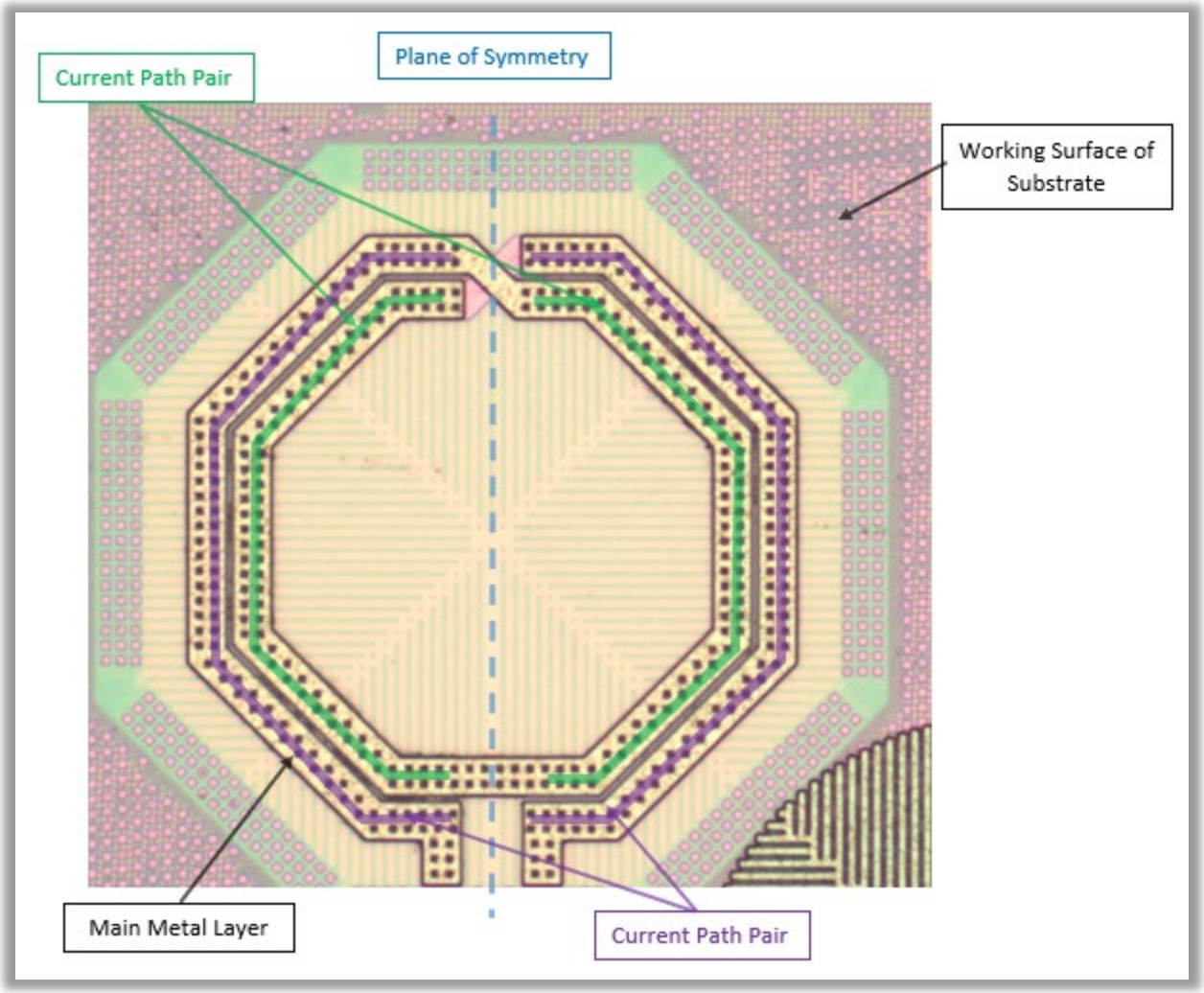
STM32WB15 Processor Package Top.



STM32WB15 Processor Die Marking.



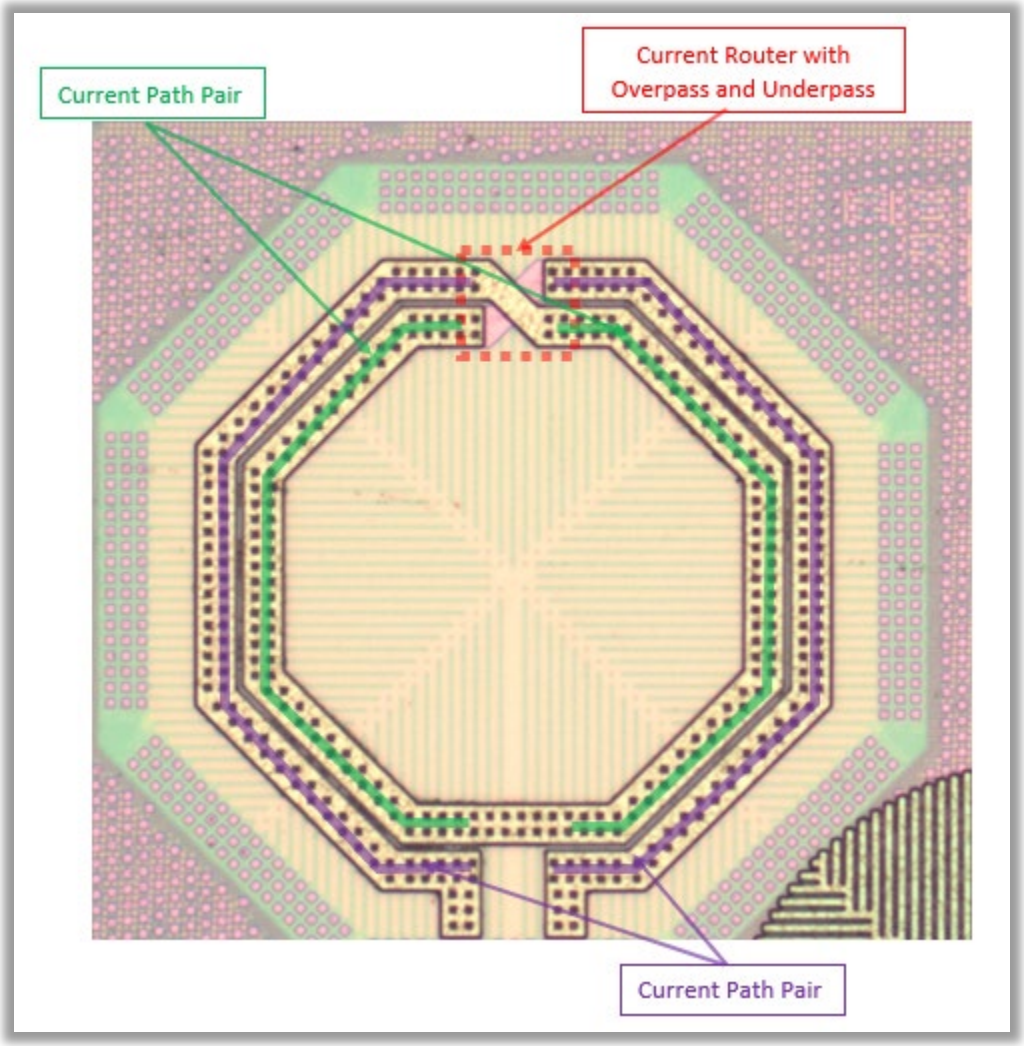
STM32WB15 Processor Die with Integrated Circuits.



STM32WB15 Processor Inductor.

49. In integrated circuits, metal current paths are patterned in a working surface of a substrate. In order to save valuable space, and to design circuits in which components do not interfere with each other, differential circuits can be used. Differential circuits comprise a first circuit that produces desired voltages and currents, and a second identical circuit that produces opposite voltages and currents. This design cancels out undesirable natural parasitic effects in the circuit. Symmetric inducting devices are useful in differential circuits. The pairs of current paths are patterned to be symmetric about the plane of symmetry, which is perpendicular to the working surface.

50. Additionally, the aforementioned method of forming a symmetric inducting device for an integrated circuit includes forming current routers having an overpass and an underpass to selectively couple one current path region in a pair of current path regions to another current path region in another pair of current path regions, wherein a width of the overpass is formed narrower than the width of the underpass to approximate resistances through the overpass and the underpass.



STM32WB15 Processor Inductor.

51. In order to form a differential circuit with opposing voltages and currents, an overpass region and an underpass region are formed to selectively couple one current path region

in a pair of current path regions to another current path region in another pair of current path regions. This has the effect of minimizing undesirable parasitic effects. The overpass metal layer has less sheet resistance than the underpass metal layer. For the inductor to function as desired, and for current to flow through all current path regions, the overpass and underpass have approximately equal resistance. Therefore, in order to approximate resistances through the overpass and underpass, and to compensate for less sheet resistance in the overpass layer, the overpass is formed narrower than the underpass.

52. Defendants have and continue to indirectly infringe one or more claims of the ’087 Patent, including claim 17, by knowingly and intentionally inducing others, including third-party semiconductor foundries, other types of third-party manufacturers, customers, and/or end-users to directly infringe, either literally or under the doctrine of equivalents, by making, using, offering to sell, selling, and/or importing into the United States the Accused Products.

53. Defendants, with knowledge that these products, and/or the manufacture thereof, infringe the ’087 Patent at least as of the date of this Complaint, knowingly and intentionally induced, and continue to knowingly and intentionally induce direct infringement of the ’087 Patent by contracting for the third-party manufacture of, and/or providing the Accused Products to direct infringers.

54. Defendants have induced infringement by others, including third-party semiconductor foundries, other types of third-party manufacturers, customers, and/or end-users, with the intent to cause infringing acts by others or, in the alternative, with the belief that there was a high probability that others infringe the ’087 Patent, but while remaining willfully blind to the infringement.

55. Defendants have and continue to infringe one or more claims of the ’087 Patent by importing into the United States or offering to sell, selling, or using within the United States a product which is made by a process patented in the United States.

56. Tyche has suffered damages as a result of Defendants’ direct and indirect infringement of the ’087 Patent in an amount to be proved at trial.

COUNT II
(Infringement of the ’481 Patent)

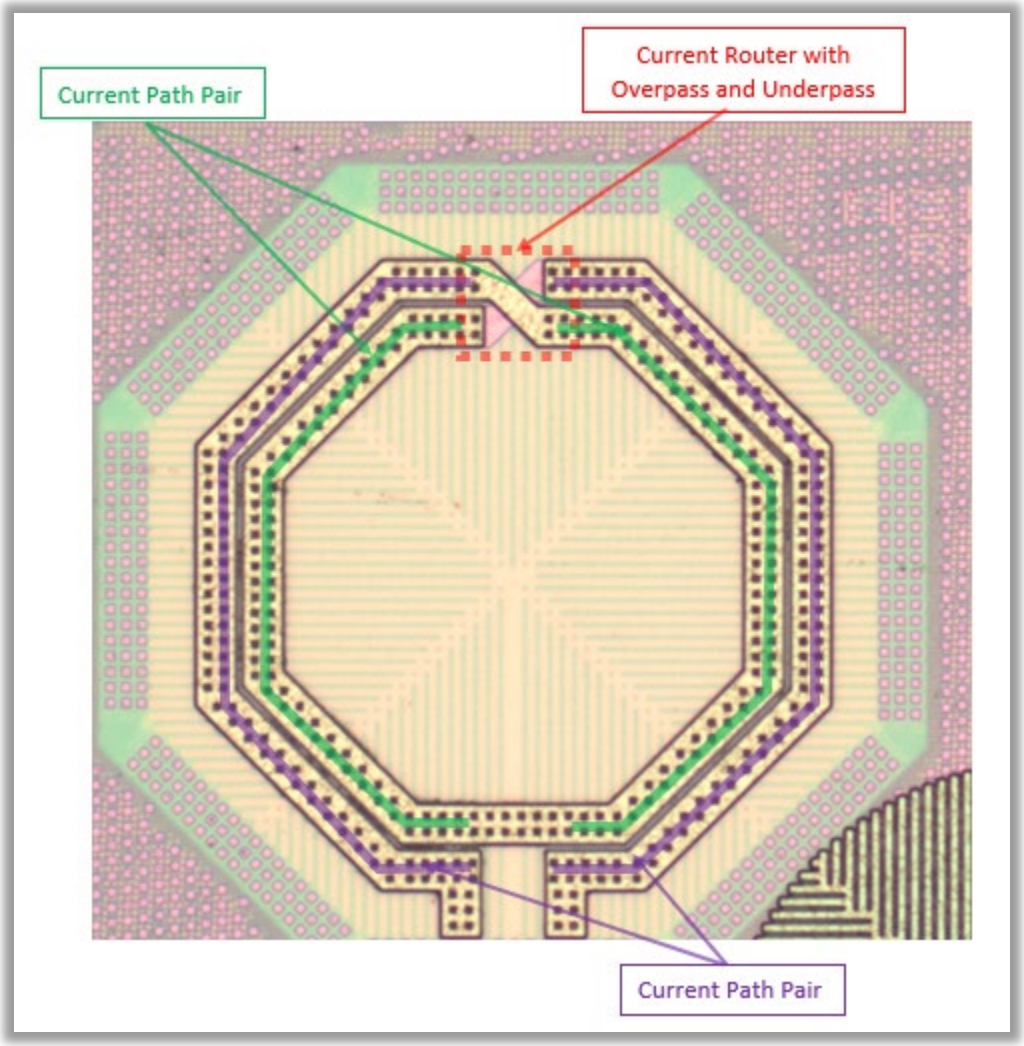
57. Paragraphs 1 through 44 are incorporated by reference as if fully set forth herein.

58. Tyche has not licensed or otherwise authorized Defendants to make, use, offer for sale, sell, or import any products that embody the inventions of the ’481 Patent.

59. Defendants have and continue to directly infringe the ’481 Patent, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, selling, and/or importing into the United States the Accused Products including, but not limited to, products that satisfy each and every limitation of one or more claims of the ’481 Patent. Upon information and belief, such products include at least STMicro processors containing a symmetric inductor with current routers in an integrated circuit.

60. For example, Defendants have and continue to directly infringe at least claim 1 of the ’481 Patent by making, using, offering to sell, selling, and/or importing into the United States products that include a current router for an inducting device in an integrated circuit. For example, the Accused Products, including the STM32WB15 processor, include a symmetric inducting device for an integrated circuit, including a current router comprising one or more overpasses to electrically connect select current path regions of the inducting device, the one or more overpasses are made from a conductive layer having a first sheet resistance, each overpass having a first width.

61. Additionally, The Accused Products, including the STM32WB15 processor, include a symmetric inducting device for an integrated circuit, including a current router comprising one or more underpasses to electrically connect different select current path regions of the inducting device, the one or more underpasses are made from a conducting layer having a second different sheet resistance, each underpass having a second different width, wherein the first width of each overpass and the second different width of an associated underpass are adjusted to make the resistance through the overpass approximately equal to the resistance through the associated underpass.



STM32WB15 Processor Inductor.

62. In order to form a differential circuit with opposing voltages and currents, an overpass region and an underpass region are formed to selectively couple one current path region in a pair of current path regions to another current path region in another pair of current path regions. This has the effect of minimizing undesirable parasitic effects. The overpass metal layer has a different sheet resistance than the underpass metal layer. For the inductor to function as desired, and for current to flow through all current path regions, the overpass and underpass have approximately equal resistance. Therefore, in order to approximate resistances through the overpass and underpass, and to compensate for the different sheet resistance in the overpass layer, the overpass is formed to have a different width than the underpass.

63. Defendants have and continue to indirectly infringe one or more claims of the ’481 Patent by knowingly and intentionally inducing others, including third-party semiconductor foundries, other types of third-party manufacturers, customers, and/or end-users, to directly infringe, either literally or under the doctrine of equivalents, by making, using, offering to sell, selling, and/or importing into the United States the Accused Products.

64. Defendants, with knowledge that these products, or the use or manufacture thereof, infringe the ’481 Patent at least as of the date of this Complaint, knowingly and intentionally induced, and continue to knowingly and intentionally induce direct infringement of the ’481 Patent by contracting for the third-party manufacture of and/or providing these products to others, including third-party semiconductor foundries, other types of third-party manufacturers, customers, and/or end-users for use in an infringing manner.

65. Defendants have induced infringement by others, including third-party semiconductor foundries, other types of third-party manufacturers, customers, and/or end-users,

with the intent to cause infringing acts by others or, in the alternative, with the belief that there was a high probability that others would infringe the '481 Patent, but while remaining willfully blind to the infringement.

66. Tyche has suffered damages as a result of Defendants' direct and indirect infringement of the '481 Patent in an amount to be proved at trial.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury for all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Tyche prays for relief against Defendants as follows:

a. Entry of judgment declaring that Defendants have directly and/or indirectly infringed one or more claims of each of the Patents-in-Suit;

b. An order awarding damages sufficient to compensate Tyche for Defendants' infringement of the Patents-in-Suit, but in no event less than a reasonable royalty, together with interest and costs;

c. Entry of judgment declaring that this case is exceptional and awarding Tyche its costs and reasonable attorney fees under 35 U.S.C. § 285; and

d. Such other and further relief as the Court deems just and proper.

Dated: May 16, 2022

Respectfully submitted,

/s/ *Alfred R. Fabricant*

Alfred R. Fabricant
NY Bar No. 2219392
Email: ffabricant@fabricantllp.com
Peter Lambrianakos
NY Bar No. 2894392
Email: plambrianakos@fabricantllp.com
Vincent J. Rubino, III
NY Bar No. 4557435
Email: vrubino@fabricantllp.com

Joseph M. Mercadante
NY Bar No. 4784930
Email: jmercadante@fabricantllp.com
FABRICANT LLP
411 Theodore Fremd Avenue, Suite 206 South
Rye, New York 10580
Telephone: (212) 257-5797
Facsimile: (212) 257-5796

Justin Kurt Truelove
Texas State Bar No. 24013653
Email: kurt@truelovelawfirm.com
TRUELOVE LAW FIRM, PLLC
100 West Houston Street
Marshall, Texas 75670
Telephone: (903) 938-8321
Facsimile: (903) 215-8510

ATTORNEYS FOR PLAINTIFF
TYCHE LICENSING LLC